
MODULE 4

EMERGENCY PREPAREDNESS, RESPONSE, AND REMEDIATION

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Introduction to Module 4: Emergency Preparedness, Response, and Remediation

This module provides guidance on preparing for spills and other emergencies at container storage areas, and responding to such emergencies when they occur. Waste management personnel should use this module to:

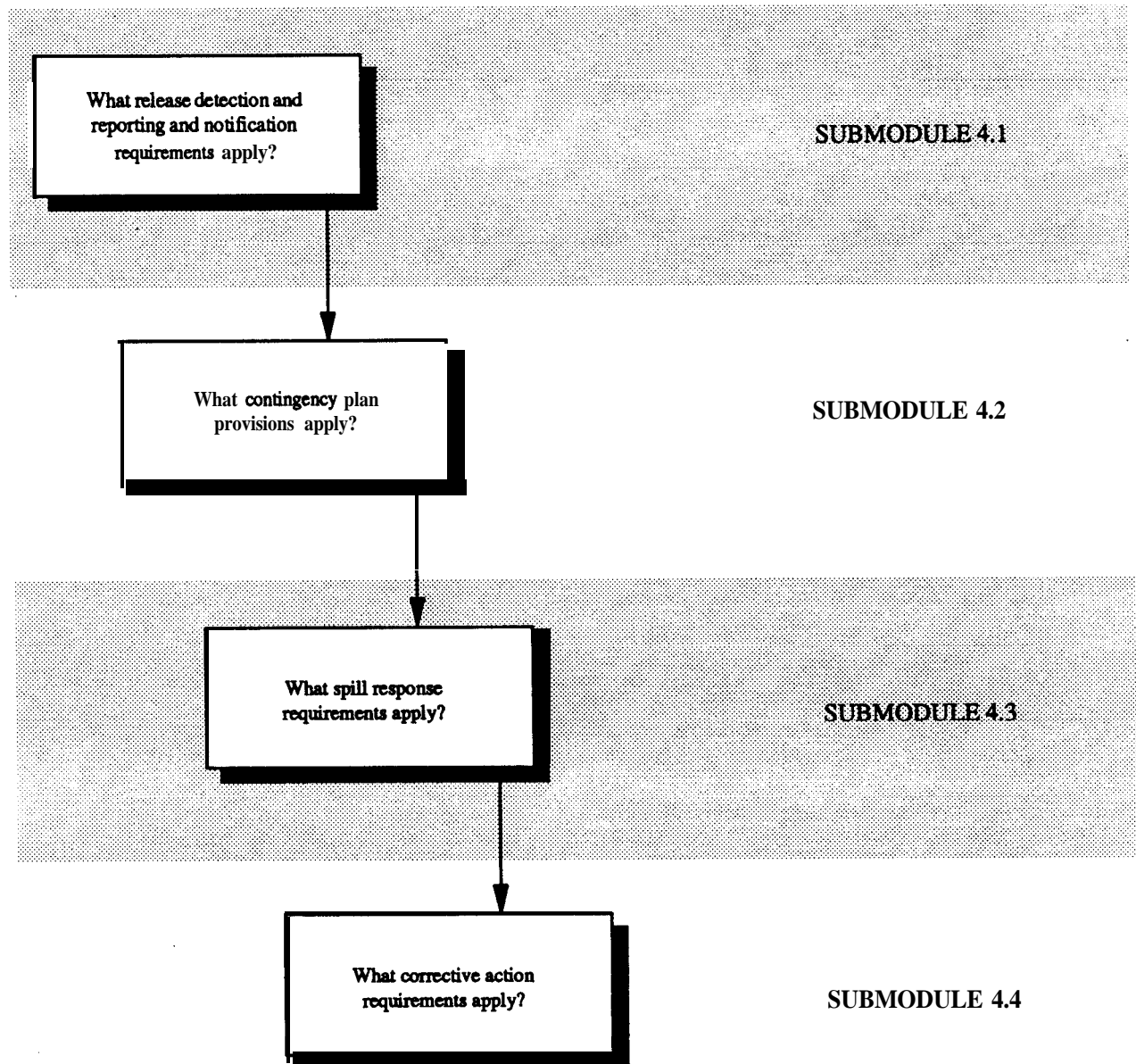
- identify technical guidance that will allow them to conduct inventories of hazardous and toxic chemicals and comply with release reporting requirements that may apply to these chemicals;
- prepare contingency plans containing the necessary elements to enable waste management personnel to prepare for emergencies that may occur;
- respond to spills; and
- comply with corrective action requirements and identify detailed technical guidance on the various components of the corrective action process.

The following flowchart and accompanying narrative discussion guides you step-by-step through the applicable requirements for container storage areas.

OVERVIEW OF MODULE 4: EMERGENCY PREPAREDNESS, RESPONSE, AND REMEDIATION

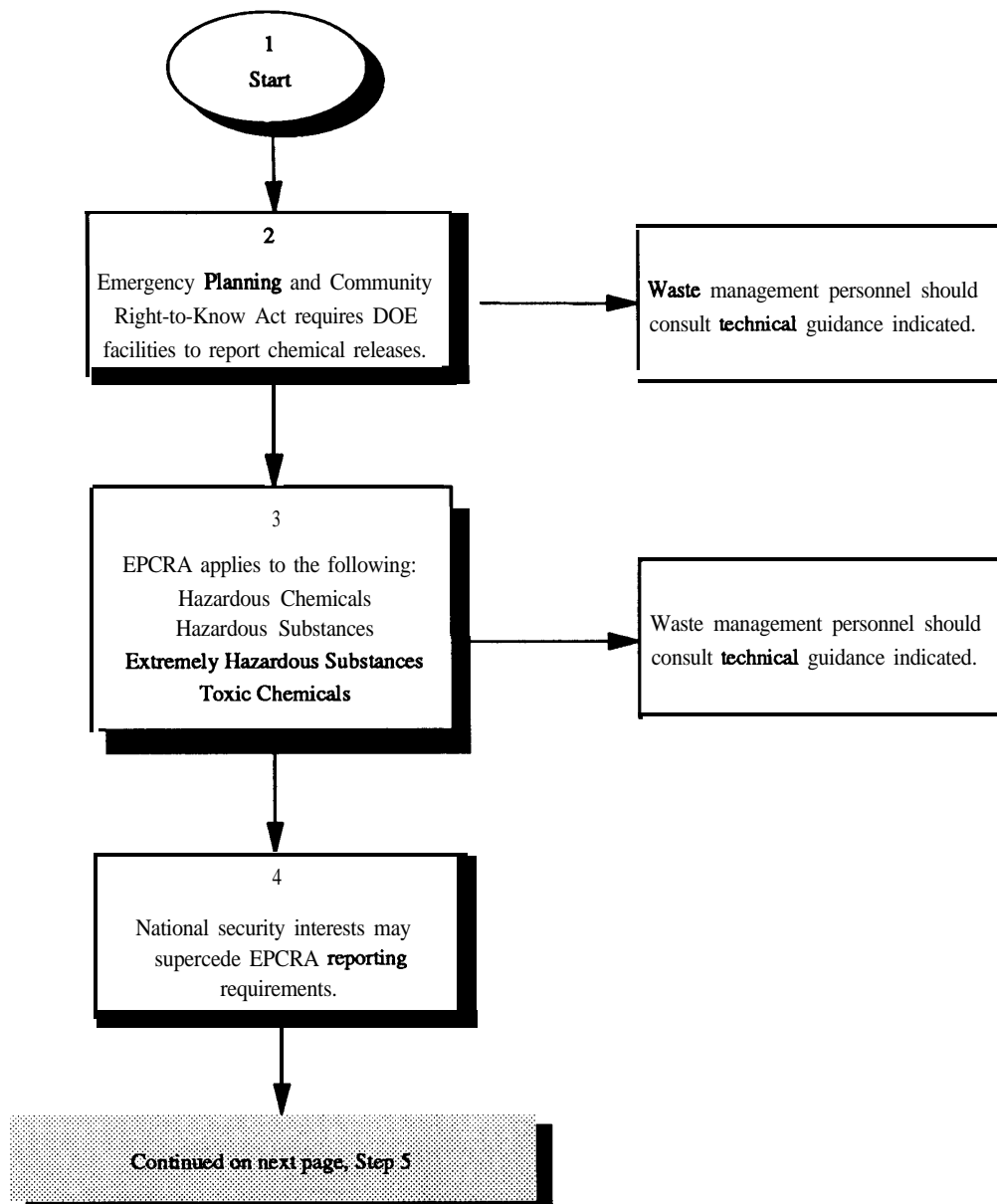
SUBMODULES CONTAINING GUIDANCE
ON CRITICAL ISSUES

CRITICAL ISSUES



Module 4: Flowchart

SUBMODULE 4.1: RELEASE DETECTION AND REPORTING



SUBMODULE 4.1 RELEASE DETECTION AND REPORTING

Step 1 Start.

Step 2 The Emergency Planning and Community Right-to-Know Act (EPCRA) of 1986, also known as Title III of the Superfund Amendments and Reauthorization Act (SARA), establishes two important release detection and reporting requirements that may be relevant for container storage areas at DOE facilities. These requirements include (1) emergency release notification and (2) reporting on releases for community right-to-know.

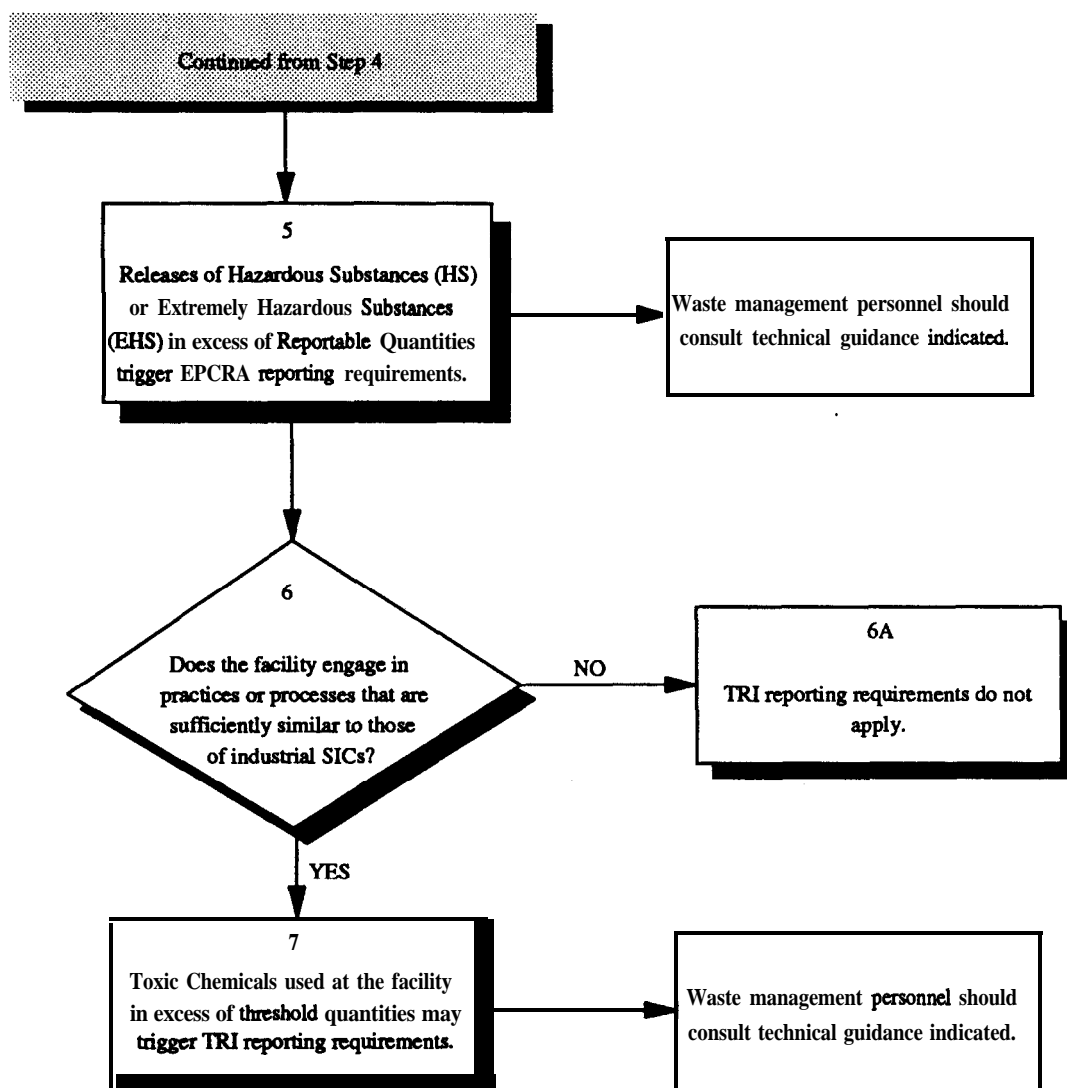
EPCRA also contains requirements for emergency planning notification and non-release related reporting requirements that may apply to DOE facilities; however, these requirements are not discussed in this submodule. Waste management personnel should consult the following materials for detailed guidance on these requirements:

- Module 2, “Emergency Planning” of *Emergency Planning and Community Right-To-Know Act*, U.S. Department of Energy, Office of Environmental Guidance, RCRA/CERCLA Division, EH-231;
- *Hazardous Materials Emergency Planning Guide*, National Response Team, NRT-1, March 1987;
- Module 4, “Community Right-to-Know” of *Emergency Planning and Community Right-To-Know Act*, U.S. Department of Energy, Office of Environmental Guidance, RCRA/CERCLA Division, EH-231; and
- *It’s Not Over in October; A Guide for Local Emergency Planning Committees; Implementing the Emergency Planning and Community Right-to-Know Act of 1986*, U.S. Environmental Protection Agency, Office of Solid Waste and Emergency Response, OSWER-90-004.

Step 3 EPCRA identifies four, somewhat overlapping, groups of chemicals that waste management personnel must identify at their facility. These four groups are Hazardous Chemicals (HCs); Hazardous Substances (HSs); Extremely Hazardous Substances (EHSs); and Toxic Chemicals (TCs). *Note that RCRA hazardous wastes are defined as HSs under EPCRA.* Waste management personnel must distinguish between these groupings because they are the basis for different EPCRA requirements. Waste management personnel should consult the following for detailed guidance on these requirements:

- Module 1, “Chemical Inventory” of *Emergency Planning and Community Right-To-Know Act*, U.S. Department of Energy, DOE/EH-0181P, March 1991. Office of Environmental Guidance, RCRA/CERCLA Division, EH-231;
- 40 CFR 355, Appendices A & B;
- 40 CFR 372.65; and
- 40 CFR 302.4.

Step 4 DOE facilities are to comply with EPCRA reporting requirements; however, Section 120(j) of SARA provides for an exemption from EPCRA reporting requirements in the interest of national security. In addition to this section of SARA, waste management personnel should refer to SEN-11-89 to assist them in making decisions regarding compliance with EPCRA and the protection of national security.



Step 5 Any time a Hazardous Substance (HS) (40 CFR 302.4) or Extremely Hazardous Substance (EHS) (40 CFR Part 355, Appendices A & B) is released into the environment in excess of the Reportable Quantity (RQ) specifically established for each HS or EHS, waste management personnel may be required to notify the National Response Center, the State Emergency Response Commission, and Local Emergency Planning Committee(s).

Certain releases are exempt from notification requirements. These exemptions include: federally permitted releases (40 CFR 355.20, 355.40; CERCLA Section 101(10) and (22); and CERCLA 103(E)); continuous releases (CERCLA 103(e)); and other excluded releases (40 CFR 302.3). For detailed guidance on detecting releases, notification requirements, and exempt releases under EPCRA, waste management personnel should consult the following materials:

- Module 3, "Emergency Release" of *Emergency Planning and Community Right-To-Know Act*, U.S. Department of Energy, Office of Environmental Guidance, RCRA/CERCLA Division, EH-231.
- *1987 Emergency Response Guidebook*, U.S. Department of Transportation, Office of Hazardous Materials Transportation, DMH-50, September 1987.
- *Reporting Releases of Hazardous Substances*, U.S. Department of Energy, Office of Environmental Guidance, RCRA/CERCLA Division, EH-CER-001/0490, April 1990.

Step 6 Section 313 of EPCRA establishes additional reporting requirements under the Federal Toxic Chemical Release Inventory (TRI) that may be applicable to some DOE facilities. Unlike the release reporting requirements discussed in Step 5, TRI reporting requirements are applicable to DOE facilities, or components thereof, engaging in practices or processes that are sufficiently similar to those conducted within industrial SICs (codes 20 - 39).

Step 6A If a DOE facility contains none of the subject operations, TRI release reporting requirements do not apply.

Step 7 The chemical on the TRI are listed in 40 CFR 372.65. Release, disposal, treatment, or storage of any TRI chemical used at the facility in excess of threshold quantities (40 CFR 372.25) requires waste management personnel to comply with annual reporting requirements. Reports are sent to EPA and State authorities. Waste management personnel should consult the following materials for technical guidance on reporting requirements under the TRI:

- Module 5, "Toxic Release Inventory" of *Emergency Planning and Community Right-To-Know Act*, U.S. Department of Energy, Office of Environmental Guidance, RCRA/CERCLA Division, EH-231.
- *The Emergency Planning and Community Right-To-Know Act*, Section 313 Release Reporting Requirements, U.S. Environmental Protection Agency, EPA 560/4-90-022.
- *Toxic Chemical Release Inventory Questions and Answers*, U.S. Environmental Protection Agency, EPA 560/4-90-003.

REFERENCES FOR SUBMODULE 4.1

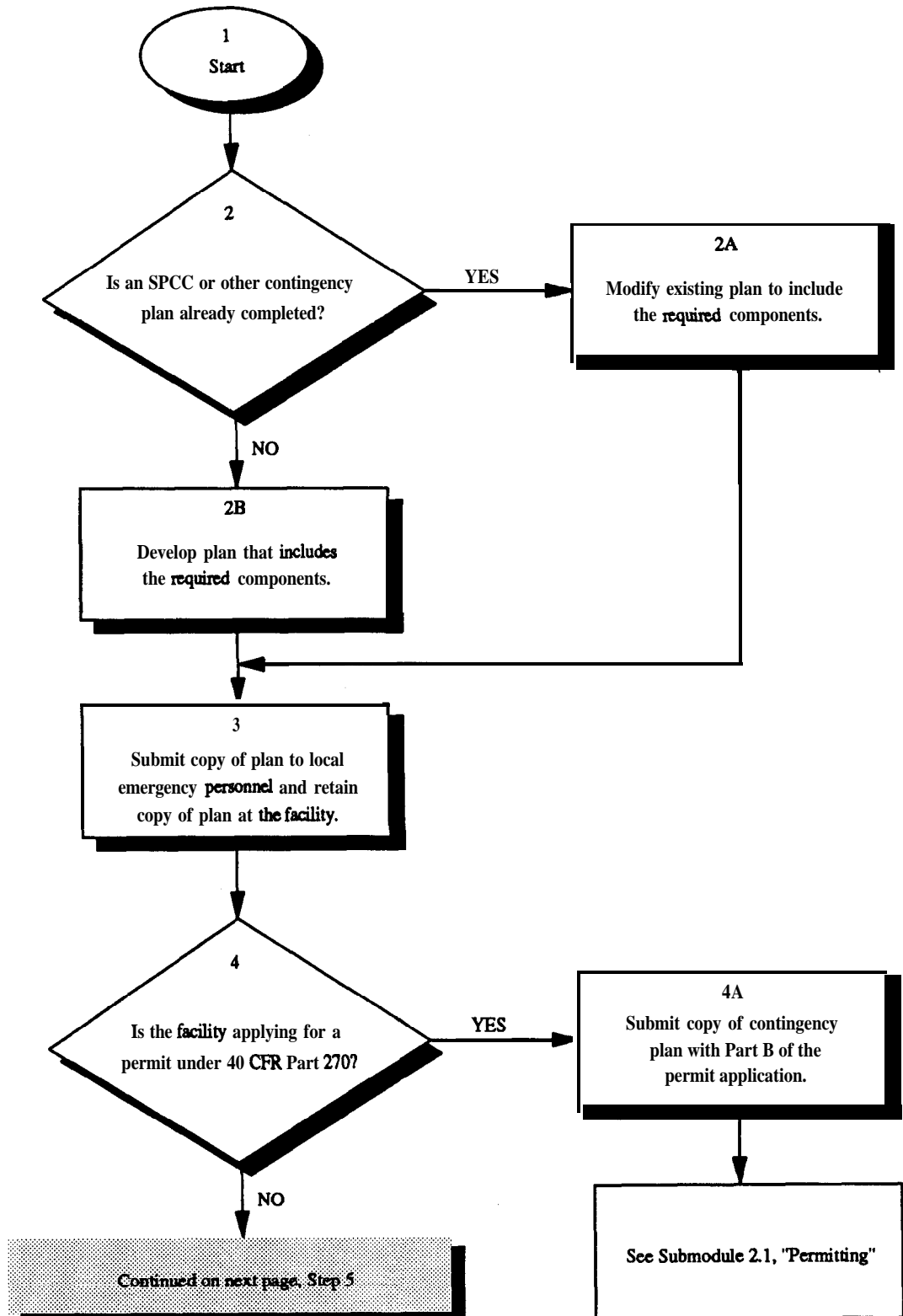
- 1) *Emergency Planning and Community Right-To-Know Act*, U.S. Department of Energy, Office of Environmental Guidance, RCRA/CERCLA Division, EH-231.
- 2) *Emergency Planning and Community Right-to-Know Act (EPCRA)*, U.S. Department of Energy, Office of Environmental Guidance, RCRA/ CERCLA Division, DOE/EH-018/P, March 1991.
- 3) *Emergency Planning and Community Right-to-Know Act of 1986 Questions and Answers*, U.S. Department of Energy, Office of Environmental Guidance, RCRA/CERCLA Division, June 1, 1989.
- 4) *Environmental Protection, Safety, and Health Protection Information Reporting Requirements*, U.S. Department of Energy, DOE Order 5484.1, February 24, 1981.
- 5) *Federal Environmental Reporting Requirements*, U.S. Department of Energy, Office of Environmental Guidance, RCRA/CERCLA Division, May 1990.
- 6) *The Emergency Planning and Community Right-To-Know Act, Section 313 Release Reporting Requirements*, U.S. Environmental Protection Agency, EPA 560/4-90-022.
- 7) *Emergency and Hazardous Chemical Inventory Forms and Community Right-to-Know Reporting Requirements*; Final Rule, U.S. Environmental Protection Agency, OSWER-081587, October 15, 1987.
- 8) *It's Not Over in October; A Guide for Local Emergency Planning Committees; Implementing the Emergency Planning and Community Right-to-Know Act of 1986*, U.S. Environmental Protection Agency, Office of Solid Waste and Emergency Response, OSWER-90-004.
- 9) *Guidance for Federal Facilities on Release Notification Requirements Under CERCLA and SARA Title III*, U.S. Environmental Protection Agency, Office of Emergency Remedial Response, EPA 9360.7-06, November 1990.
- 10) *Reporting Requirements for Continuous Releases of Hazardous Substances -- A Guide for Facilities and Vessels on Compliance*, U.S. Environmental Protection Agency, EPA/540/G-91/003.
- 11) *Reporting Releases of Hazardous Substances*, U.S. Department of Energy, Office of Environmental Guidance, RCRA/CERCLA Division, EH-CER-001/0490, April 1990.
- 12) *RCRA Contingency Plans and Emergency Procedures*, U.S. Department of Energy, Office of Environmental Guidance, RCRA/CERCLA Division, Information Brief, EH-231-006/0991, September 1991.

REFERENCES FOR SUBMODULE 4.1 (cont.)

- 13) *Extremely Hazardous Substance List and Threshold Planning Quantities; Emergency Planning and Release Notification Requirements; Final Rule*, U.S. Environmental Protection Agency, OSWER-042287, April 27, 1987.
- 14) *Toxic Chemical Release Inventory Questions and Answers*, U.S. Environmental Protection Agency, EPA 560/4-90-003.
- 15) *Emergency Planning and Community Right-to-Know Act: a Status of State Actions*, National Governors Association, April 1988.
- 16) *1987 Emergency Response Guidebook*, Department of Transportation, Office of Hazardous Materials Transportation, DMH-50, September 1987.
- 17) *Hazardous Materials Emergency Planning Guide*, National Response Team, NRT-1, March 1987.
- 18) 40 CFR Part 302 -- Designation, reportable quantities, and notification.
- 19) 40 CFR 355 -- Emergency planning and notification.
- 20) 40 CFR 372.65 -- Chemicals and chemical categories.

Module 4: Flowchart

SUBMODULE 4.2: CONTINGENCY PLANS



SUBMODULE 4.2 CONTINGENCY PLANS

Step 1 Start.

Step 2 DOE container storage areas for hazardous wastes and radioactive mixed wastes are required to have or be included in a contingency plan. In general, the plan must be designed to minimize threats to human health or the environment from fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water (40 CFR 264.51 and 265.51).

Step 2A If waste management personnel have already completed a Spill Prevention, Control, and Countermeasure (SPCC) Plan in accordance with 40 CFR Part 112, or some other emergency or contingency plan, they need only amend the existing plan so that it includes the provisions listed under Step 2B (40 CFR 264.52 and 265.52).

Step 2B If waste management personnel have not already completed a SPCC or other emergency plan, then a contingency plan will have to be developed.

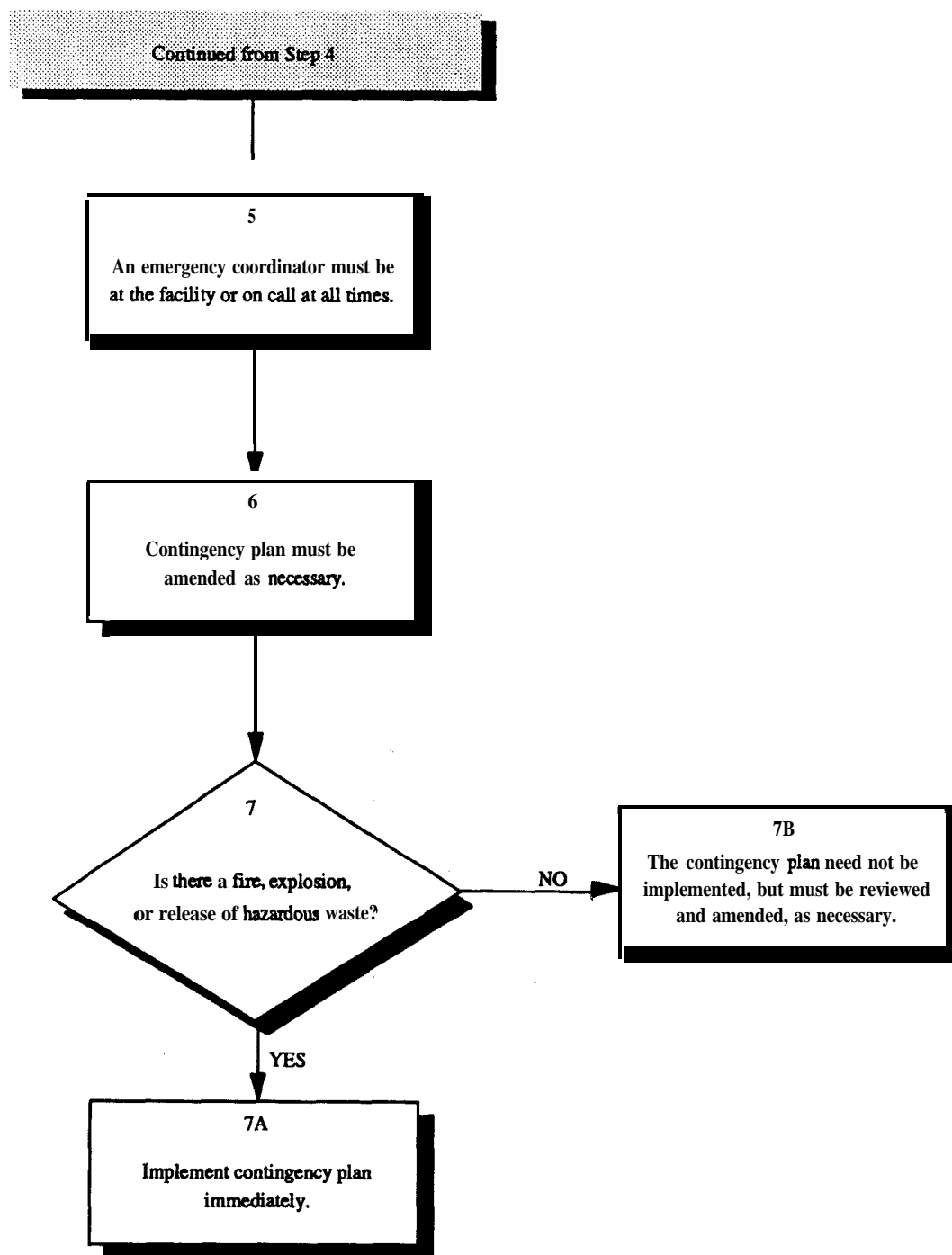
Contingency plans prepared by waste management personnel must contain the following components:

- The actions to be taken in response to any emergencies;
- Arrangements with local emergency response personnel (e.g., police departments, fire departments, hospitals, and contractors) to coordinate emergency services;
- The names, addresses, and work and home phone numbers of all persons qualified to serve as emergency coordinator. One person at the facility must be designated as primary coordinator, while the remaining persons should be listed in the order in which they will assume responsibility;
- A list of all emergency equipment at the container storage area (e.g., fire extinguishers, spill containment equipment, and decontamination equipment), including the location, a physical description, and the capabilities of each item on the list; and
- An evacuation plan for facility personnel, including the signal to be used to begin evacuation, and primary and alternate evacuation routes.

Step 3 Waste management personnel must retain a copy of the contingency plan at the facility. In addition, a copy of the plan must be submitted to all State and local emergency response personnel that may be called upon to provide emergency services (40 CFR 264.53 and 265.53).

Step 4 Submodule 2.3, "Permitting," should be referenced to determine if the facility must apply for a permit.

Step 4A Any facility applying for a permit under 40 CFR Part 270 must submit a copy of the contingency plan with Part B of the permit application.



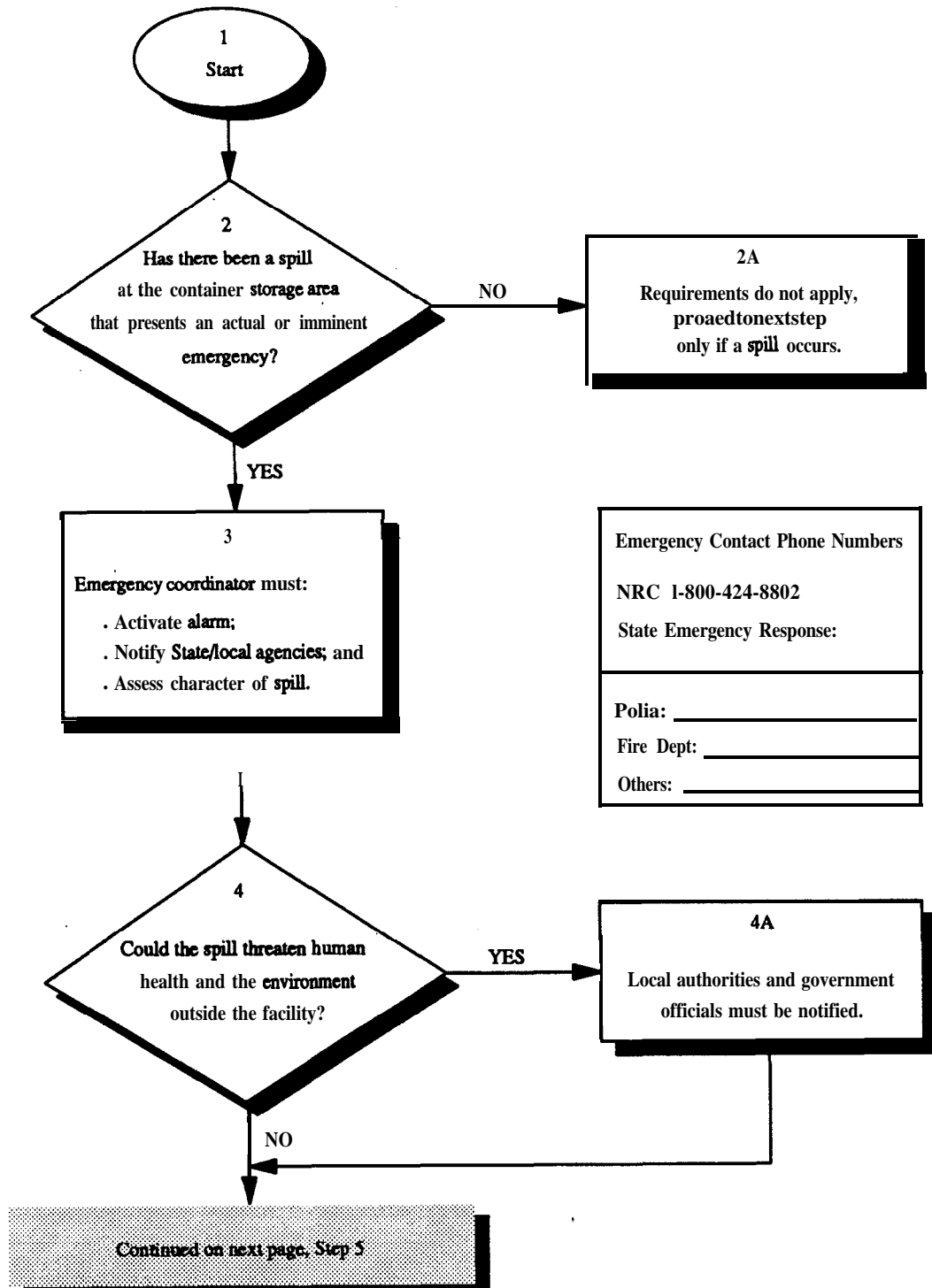
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- Step 5** DOE facilities must have an emergency coordinator at the facility or on call at all times. The coordinator must be familiar with the container storage area's contingency plan, all operations and activities at the container storage area, the location and characteristics of all wastes handled, the location of all records in the container storage area, and the container storage area layout. In addition, the coordinator must have the authority to commit the resources needed to carry out the contingency plan.
- Step 6** Waste management personnel must review and amend the contingency plan, if necessary, in the event:
- the facility permit is revised;
 - the plan fails in an emergency;
 - the facility changes in its design, construction, or operating and maintenance procedures in a manner which increases the potential for fires, explosions, or releases;
 - the list of emergency coordinators changes; or
 - the list of emergency equipment changes.
- Step 7** Use of the contingency plan is triggered whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituent which could threaten human health or the environment.
- Step 7A** The provisions of the contingency plan must be carried out immediately and in full. If the plan fails, it must be modified (see Step 6).
- Step 7B** The contingency plan need only be implemented in the event of such an emergency. However, DOE personnel must be prepared to review and modify the plan as per Step 6.

REFERENCES FOR SUBMODULE 4.2

- 1) *RCRA Contingency Plans and Emergency Procedures*, U.S. Department of Energy, Office of Environmental Guidance, RCRA/CERCLA Division, Information Brief, EH-231-006/0991, September 1991.
- 2) *Preparation of RCRA Contingency Plans*, U.S. Department of Energy, Office of Environmental Guidance, RCRA/CERCLA Division, (forthcoming).
- 3) 40 CFR 264 Subpart D -- Contingency plan and emergency procedures.
- 4) 40 CFR Part 112 -- Oil pollution prevention.

Module 4: Flowchart

SUBMODULE 4.3: SPILL RESPONSE



SUBMODULE 4.3 SPILL RESPONSE

Step 1 Start.

Step 2 These requirements apply to any DOE container storage area at which a spill of hazardous or radioactive mixed waste that represents an actual or imminent emergency situation occurs (40 CFR 264.56 and 265.56).

Step 2A Absent a spill, the requirements below do not apply, but may in the future if a spill occurs.

Step 3 In the event of a spill, the emergency coordinator, or his designee, must immediately:

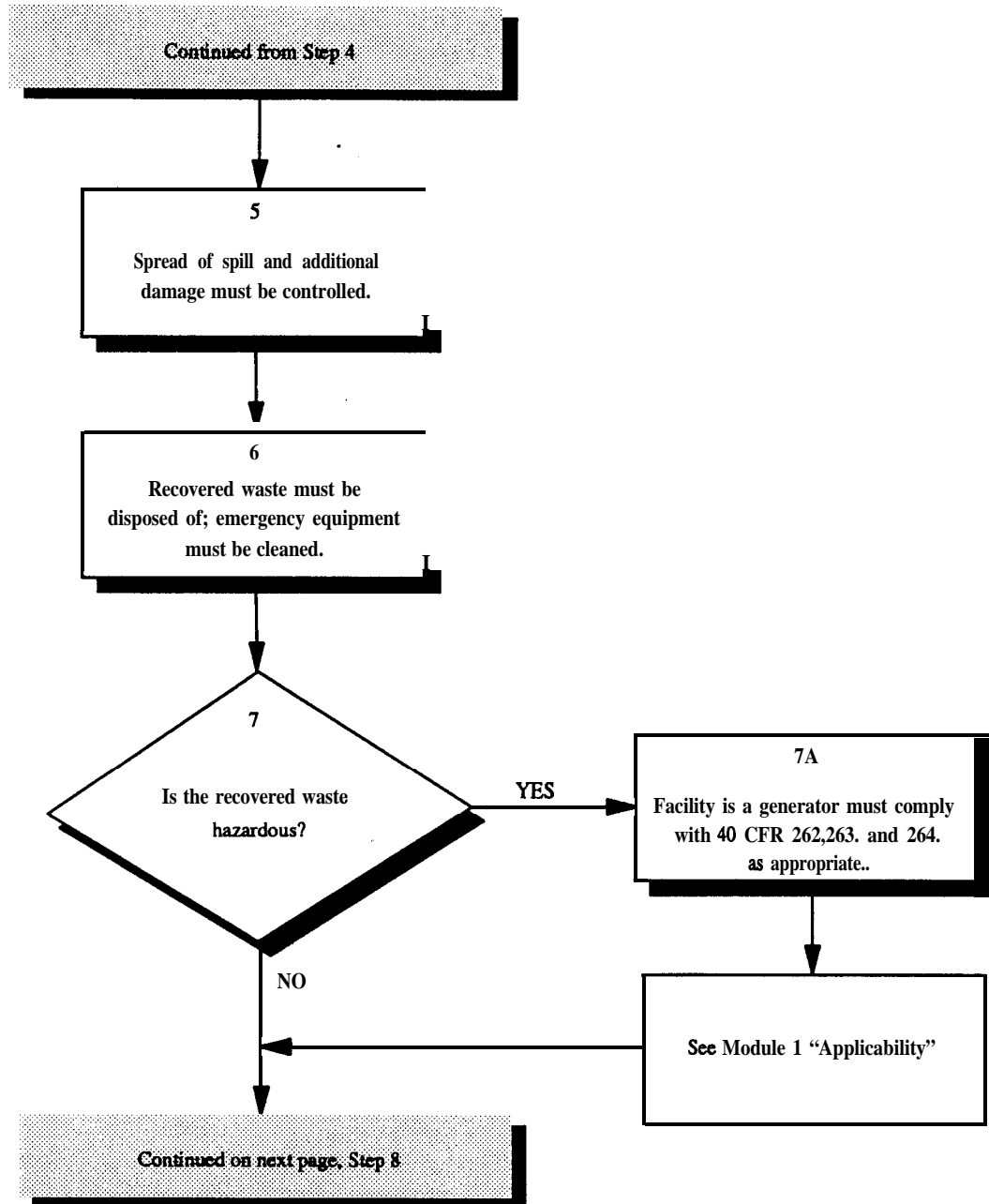
- activate internal alarms or communication systems to notify all facility personnel;
- notify appropriate State or local agencies with response roles if their help is needed; and
- immediately assess the character, exact source, amount, and areal extent of the spill. This assessment may be done by observation or review of records or manifests, and, if necessary, by chemical analysis. In addition, the emergency coordinator must assess possible hazards to human health or the environment that may result from the spill. This assessment must consider both direct and indirect effects of the release.

Step 4 Additional notification requirements apply if it is determined during the spill assessment that the spill could threaten human health or the environment outside the property line of the facility.

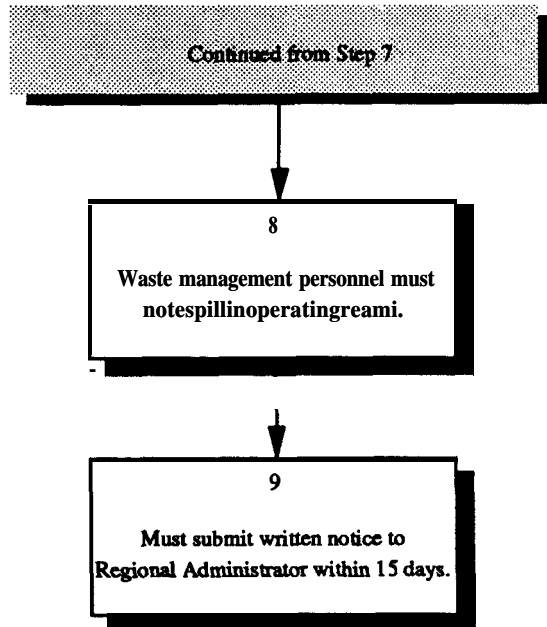
Step 4A If the emergency coordinator determines that the spill could threaten human health or the environment outside the property line of the facility, the coordinator must take the following actions:

- notify the appropriate local authorities if the evacuation of local areas may be advisable and assist the authorities in determining if evacuation is advisable; and
- notify the government official designated as the on-scene coordinator for that geographic area or the National Response Center (800/424-8802). If radioactive substances are present in the spill, the EPA radiological response coordinator should be notified for evaluation and assistance. The report to the appropriate official must include the name and telephone number of the reporter, name and address of the facility, time and type of incident (e.g., container spill), name and quantity of materials involved, the extent of injuries, and the possible hazards to human health or the environment outside the facility.

For more information on proper notification requirements in the event of release, see Submodule 4.1, "Release Detection and Reporting."



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- Step 5** During the spill and spill cleanup, the emergency coordinator must control the spread of the spill and prevent other damage from occurring to containers that might worsen the threat from the spill. These measures must include, where applicable, stopping processes and operations, collecting and containing release waste, and removing or isolating containers. If operations are stopped during a spill or spill cleanup, the emergency coordinator must monitor for leaks, gas generation, etc. In addition, the emergency coordinator must ensure that no waste incompatible with the released waste are treated, stored, or disposed of until spill cleanup is complete.
- Step 6** The emergency coordinator must arrange for treatment, storage, or disposal of recovered waste, contaminated soil or surface water, or any other material resulting from the spill. In addition, all emergency equipment listed in the contingency plan must be cleaned and ready for its intended use before operations resume. Waste management personnel must notify the appropriate EPA Regional Administrator, and appropriate State and local authorities, that the container storage area has complied with the requirements for incompatible wastes and clean-up of emergency equipment (40 CFR 264.50-264.56).
- Step 7** If waste management personnel can demonstrate that the recovered material is not a hazardous waste, then the container storage area is not subject to hazardous waste generator requirements.
- Step 7A** Unless waste management personnel can demonstrate that the recovered material is not a hazardous waste, the container storage area is considered a generator of hazardous waste and must manage it in accordance with all applicable requirements of 40 CFR Parts 262, 263, and 264. For additional information, waste management personnel should consult Module 1, "Applicability."



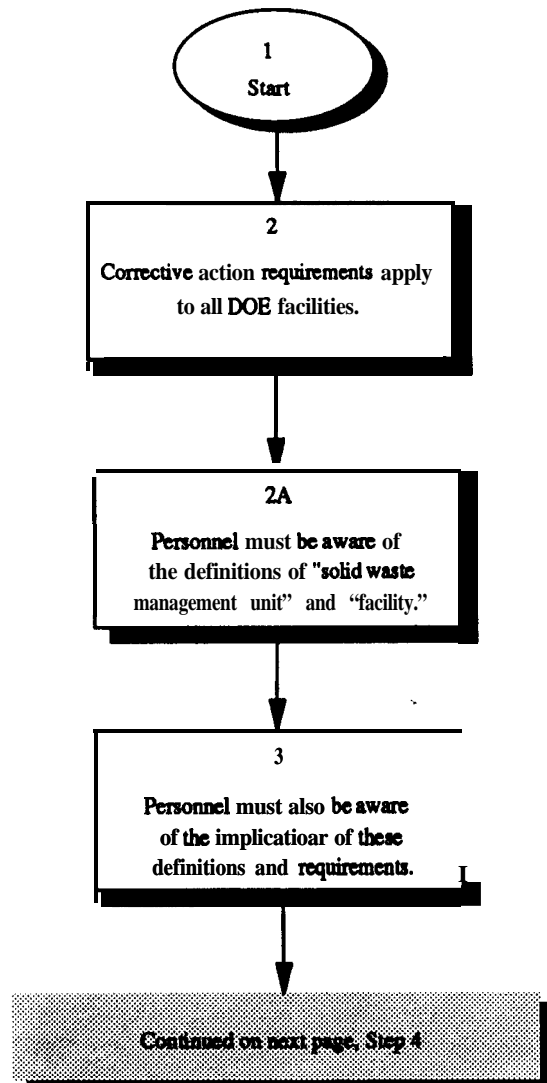
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- Step 8** Waste management personnel must note in the operating record the time, date, and details of any container spill requiring implementation of the contingency plan.
- Step 9** A written report must be submitted to the Regional Administrator or State Director within 15 days after the spill. The report must include the following information:
- name, address, and telephone number of the waste management personnel responsible for operating the container storage area;
 - date and time of the spill;
 - name and quantity of materials involved;
 - the extent of injuries, if any;
 - an assessment of actual or potential hazards to human health or the environment, where this is applicable; and
 - estimated quantity and disposition of recovered material that resulted from the spill.

REFERENCES FOR SUBMODULE 4.3

- 1) *Guidance Document for Cleanup of Surface Tank and Drum Sites, Final*, U.S. Environmental Protection Agency, Office of Emergency Remedial Response, OSWER Directive No. 9380.0-03, May 1985.
- 2) 40 CFR 264 Subpart D -- Contingency plan and emergency procedures.
- 3) See also references in Submodule 4.1, "Release Detection Reporting."

Module 4: Flowchart

SUBMODULE 4.4: CORRECTIVE ACTION



SUBMODULE 4.4 CORRECTIVE ACTION

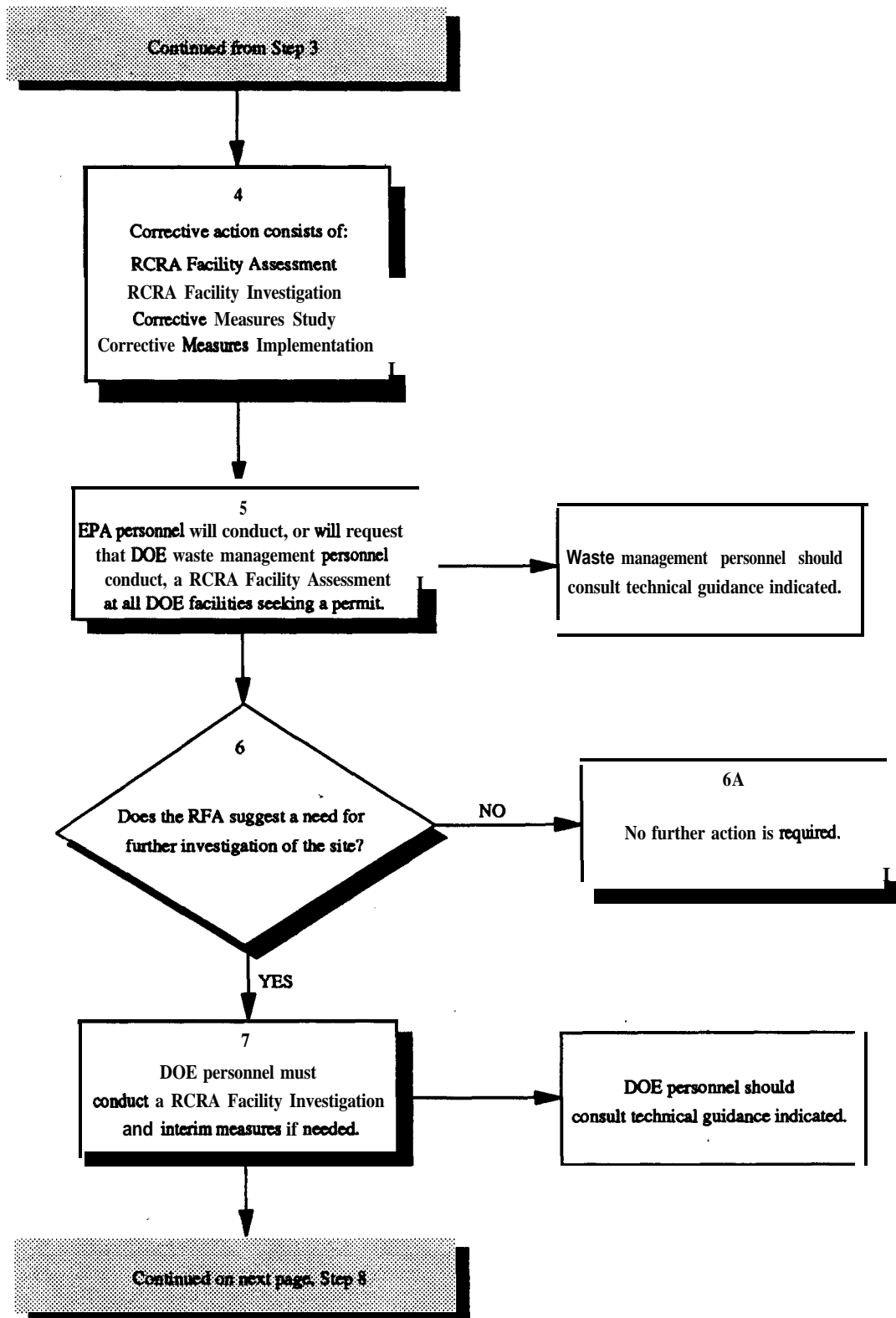
Step 1 Start.

Step 2 RCRA corrective action requirements apply to all DOE facilities seeking permits under Subtitle C at which there are releases of hazardous wastes or hazardous constituents from any solid waste management unit (SWMU) at the facility, regardless of when the wastes were placed in the unit (40 CFR 264.101).

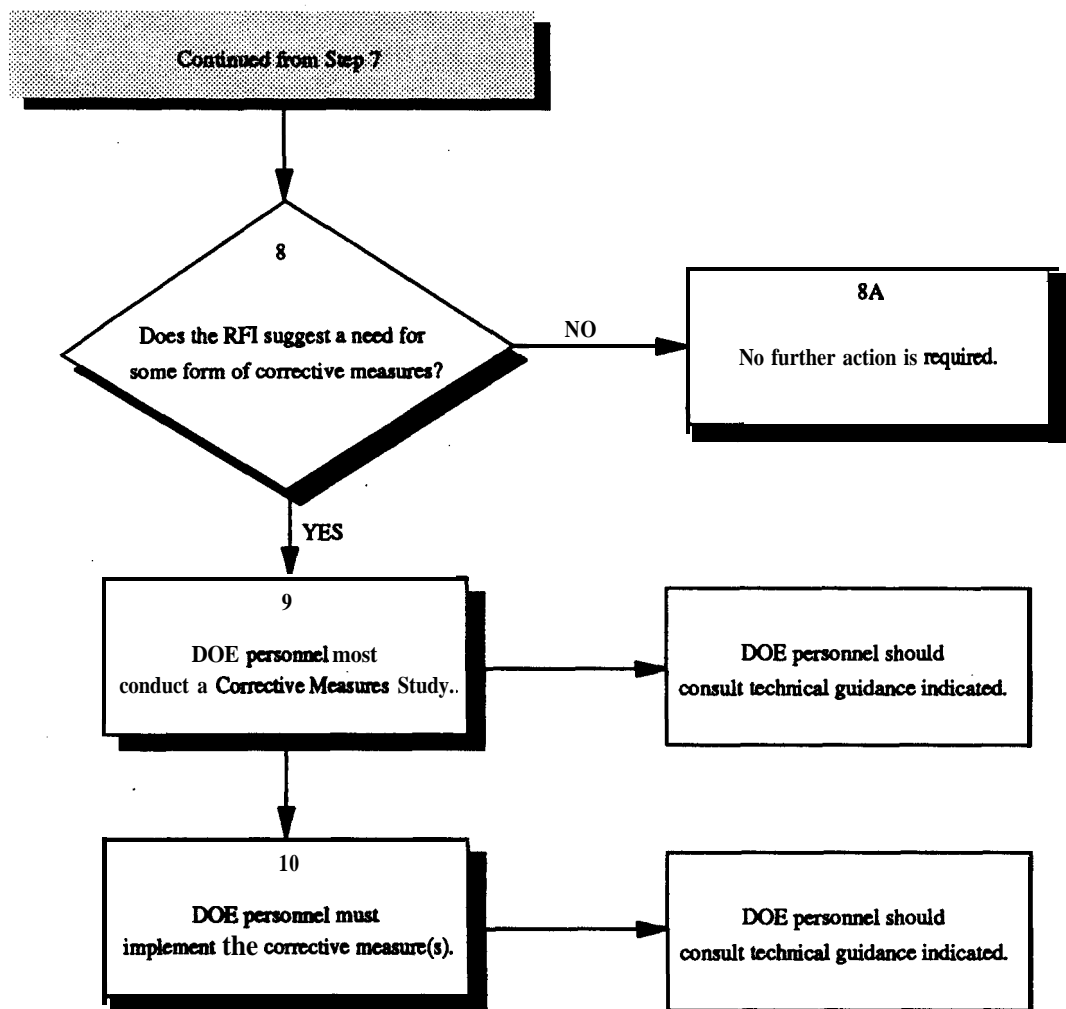
Step 2A A SWMU is defined as "any discernible unit at which solid wastes have been placed at any time, irrespective of whether the unit was intended for the management of hazardous or solid waste." Such units include any area of the facility at which solid wastes have been routinely and systematically released (e.g., a loading dock at a container storage area at which spills occur with regularity). In the context of corrective action, a facility is defined as all contiguous property under the control of the owner/operator (DOE) of a facility seeking a permit under Subtitle C (55 FR 30808).

Step 3 The implications for container storage areas at DOE facilities of the corrective action requirement of 40 CFR 264.101 and the definitions of "SWMU" and "facility" are as follows:

- if a single unit within a facility applies for a permit, all the units at the facility may be affected. If waste management personnel operating a container storage area or any SWMU at a DOE facility apply for a permit, DOE may be required to take corrective action to address a release at any SWMU at the facility, even if the unit is inactive, or never accepted DOE wastes.
- properties that are not physically in contact may be part of a single facility. The term "contiguous property" in the context of a facility, is broadly defined. In other words, DOE property that is separated by a stream, roadway, high power transmission line, or other such property may be considered contiguous, and is therefore considered a single facility for the purposes of corrective action.
- corrective action requirements apply to both permitted and interim status facilities. EPA is authorized to address corrective action through the permit process pursuant to RCRA Section 3004(u) and 3004(v). Corrective action at interim status facilities may be addressed through a corrective action enforcement order issued pursuant to RCRA Section 3008(h).
- the term "release" is defined broadly to include both hazardous wastes and hazardous constituents. Hazardous wastes include those listed in 40 CFR Part 261, or any "characteristic" hazardous waste (i.e., ignitable, corrosive, reactive, or toxic) as defined in 40 CFR 261.20 through 261.24. Hazardous constituents are listed in 40 CFR Part 261, Appendix XIII and 40 CFR Part 264, Appendix IX. EPA used this broad definition because of its concern about addressing releases of hazardous constituents (e.g., lead, cadmium) that may have originated from wastes that are not necessarily defined as hazardous under RCRA.
- clean up requirements at DOE facilities may be implemented under different statutory authorities. Corrective action at DOE facilities may be implemented either under RCRA, CERCLA, or both. State statutes may also apply. The choice of authority for implementing corrective action will generally be determined by negotiating a Federal facility agreement (FFA) in the form of an interagency agreement (IAG).



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- Step 4** Detailed requirements and procedures for corrective action have not yet been finalized, therefore EPA has been implementing corrective action largely through guidance (see references at the end of this submodule). There are four components to the corrective action process. These components are: RCRA Facility Assessment, RCRA Facility Investigation, Corrective Measures Study, and Corrective Measures Implementation. waste management personnel should also refer to the recently proposed Subpart S (55 FR 30798) corrective action rule for more information.
- Step 5** A RCRA Facility Assessment (RFA) is performed to determine areas of potential release of hazardous wastes or hazardous constituents at RCRA facilities and to identify releases or suspected releases needing further investigation. In most cases the RFA will be performed by DOE personnel; however, EPA or State personnel may elect to prepare the RFA based on information provided by DOE personnel and on regular site inspections. Note that a Preliminary Assessment/Site Investigation (PA/SI) conducted under CERCLA may perform the same function as an RFA. Because of its Federal facility standing, in most cases, who conducts the RFA, and under what authority it is conducted, will be determined though an IAG. For additional guidance on conducting RFAs, waste management personnel should consult the following:
- *Corrective Action Plan*, U. S. Environmental Protection Agency, Office of Waste Programs Enforcement, OSWER 9902.3, November 1986.
 - *Practical Guide for Assessing and Remediating Contaminated Sites*, U. S. Environmental Protection Agency, Office of Solid Waste, May 1989.
 - *RCRA Facility Assessment Guidance*, U. S. Environmental Protection Agency, Office of Solid Waste, October 1986.
- Step 6** If, as a result of the RFA, further investigation is warranted, DOE personnel will conduct a RCRA Facility Investigation (RFI) to verify that a release has occurred and to characterize the nature, extent, and rate of migration of the release.
- Step 6A** If no further investigation is indicated by the RFA, no further action is required.
- Step 7** Depending on the type of release, the RFI will generally involve activities such as soil sampling, ground-water monitoring, and surface water monitoring. If during the course of the RFI, interim corrective measures are determined to be necessary to address an immediate threat, DOE personnel will implement these interim corrective measures. For additional technical guidance on conducting RFIs or interim corrective measures, DOE personnel should consult the following:
- *RCRA Facility Investigation Guidance*, U.S. Environmental Protection Agency, Office of Solid Waste, OSWER Directive No. 9502.00.6C, July 1987.
 - *RCRA Corrective Action Interim Measures, Interim Final*, U. S. Environmental Protection Agency, Office of Waste Programs Enforcement, Office of Solid Waste, OSWER Directive No. 9902.4, June 1988.



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- Step 8** If the RFI determines that some sort of corrective measure is required, DOE personnel will conduct a Corrective Measures Study (CMS).
- Step 8A** If the RFI does not suggest a need for corrective measures, no further action is required.
- Step 9** The purpose of a CMS is to develop and evaluate various corrective measures alternatives and to recommend a final corrective measure or measures. For additional technical guidance on conducting CMSs, DOE personnel should consult the following:
- *Corrective Measures for Releases to Ground Water from Solid Waste Management Units*, U.S. Environmental Protection Agency, Office of Solid Waste, Draft Final, PB88-185251.
 - *Corrective Measures for Releases to Soil from Solid Waste Management Units*, U.S. Environmental Protection Agency, Office of Solid Waste, PB88-185277, August 1985.
 - *Corrective Measures for Releases to Surface Water*, U.S. Environmental Protection Agency, Office of Solid Waste, Draft Final, PB88-185251.
 - *Technical Guidance for Corrective Measures: Determining Appropriate Technology and Response for Air Releases*, U.S. Environmental Protection Agency, Office of Solid Waste, PB88-185269, March 1985.
- Step 10** The final step in the corrective action process is the Corrective Measures Implementation (CMI). The objective of the CMI is to design, construct, operate, maintain, and monitor the performance of the corrective measure or measures selected as a result of the CMS. It is conceivable that one of the options considered in the CMS will be a "do nothing" option; however, in nearly every case, a CMS will eventually lead to some sort of corrective measures being implemented. For additional technical guidance on implementing corrective measures, DOE personnel should consult the guidance manuals listed above in Step 9 as well as the following publication.
- *Remedial Action at Waste Disposal Sites*, U.S. Environmental Protection Agency EPA/625/6-85/006, June 1985.

REFERENCES FOR SUBMODULE 4.4

- 1) *Corrective Action Plan*, U.S. Environmental Protection Agency, Office of Waste Programs Enforcement, OSWER 9902.3, November 1986.
- 2) *Corrective Measures for Releases to Ground Water from Solid Waste Management Units*, U.S. Environmental Protection Agency, Office of Solid Waste, Draft Final, PB 88-185251.
- 3) *Corrective Measure for Releases to Soil from Solid Waste Management Units*, U.S. Environmental Protection Agency, Office of Solid Waste, PB88-185277, August 1985.
- 4) *Corrective Measure for Releases to Surface Water*, U.S. Environmental Protection Agency, Office of Solid Waste, Draft Final, PB88-185251.
- 5) *RCRA Corrective Action Interim Measures, Interim Final*, U.S. Environmental Protection Agency, Office of Waste Programs Enforcement, Office of Solid Waste, OSWER Directive No. 9902.4, June 1988.
- 6) *RCRA Facility Investigation (RFI) Guidance*, U.S. Environmental Protection Agency, Office of Solid Waste, OSWER Directive No. 9502.00.6C, July 1987.
- 7) *Technical Guidance for Corrective Measures: Determining Appropriate Technology and Response for Air Releases*, U.S. Environmental Protection Agency, Office of Solid Waste, PB88-185269, March 1985.
- 8) 40 CFR 264.100 -- Corrective action program.
- 9) 40 CFR 264.101 -- Corrective action for solid waste management units.
- 10) 40 CFR 264 Subpart S (proposed) -- Corrective action.